

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
MANHATTAN DIVISION**

CASE NO.: 1:19-cv-7750-AJN

BRYAN E. GLYNN,

Plaintiff,

v.

TOTALPRESTIGE INC.,

Defendant.

MOTION FOR EXTENSION OF TIME

Plaintiff BRYAN E. GLYNN by and through his undersigned counsel, hereby moves this Honorable Court for an extension of time to TO SERVE DEFENDANT TOTALPRESTIGE INC. (TPI), and as grounds therefore states as follows:

1. Plaintiff filed the complaint with this court on August 19, 2019.
2. The summons against TPI was issued on August 20, 2019.
3. The deadline to serve TPI the complaint is today, Monday November 18, 2019.
4. Service was attempted against TPI on September 23, 2019, by serving its registered agent at via Agents and Corporations, Inc. at 1201 N. Orange Street, Suite 600, Wilmington, DE 19801. Service was unsuccessful as the process server's report confirms registered agent states the entity has been inactive since 2009. A copy of the affidavit of service is attached as Exhibit A.
5. Service was attempted again against TPI on September 26, 2019, at 1133 Broadway, Suite 706, New York, NY 10010. Service was unsuccessful as the process server

confirms that the defendant was not located at this location. A copy of the affidavit of service is attached as Exhibit B.

6. Plaintiff attempted to contact TPI's chief executive officer via electronic mail at Rose.perez@totalprestige.com on October 11, 2019. To date no reply has been received. The outgoing email has been provided as Exhibit C.

7. Plaintiff has ordered a copy of TPI's magazine as of November 5, 2019, in order to determine an updated address where TPI may be formally served. TPI's order confirmation states that the magazine can take approximately sixty days to arrive. Therefore, placing the arrival of the magazine after the service deadline on or around December 31, 2019.

8. Further the magazine's arrival may be later than normal due to the upcoming holiday winter season.

9. Therefore, Plaintiff's moves this court for an extension of time to serve TPI for an additional eighty days up to and including January 24, 2020.

WHEREFORE, Plaintiff BRYAN E. GLYNN prays this Honorable Court for

DATED: November 18, 2019

Respectfully submitted,

/s/ Joseph A. Dunne

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Attorneys for Plaintiff Bryan E. Glynn

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on November 18, 2019, a true and correct copy of the foregoing document was served by electronic mail by the Court's CM/ECF System to all parties listed below on the Service List.

/s/ Joseph A. Dunne

JOSEPH A. DUNNE

SERVICE LIST

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